

# ***EXHIBIT H***

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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UNITED WHOLESALE  
MORTGAGE, LLC,

Plaintiff

-v-

KEVRON INVESTMENTS, INC.,

Defendant

Case No 2:22-cv-10395

Hon. Laurie Jill Michelson

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DEFENDANT KEVRON INVESTMENTS, INC.'S RESPONSES TO  
PLAINTIFF'S FIRST REQUESTS FOR ADMISSION

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1. Admit that UWM's actual damages for a breach of the All-In Addendum are: (a) uncertain and (b) difficult to ascertain or (c) are of a purely speculative nature.

*Response* Denied

2. Admit that UWM's liquidated damages provided under the All-In Addendum are a) reasonable with relation to the injury suffered by UWM for a breach of the All-In Addendum and b) are not unconscionable or excessive

*Response* Denied

3. Admit that Kevin Rhatigan electronically signed the Wholesale Broker Agreement made and entered into as of 7/22/2019 (e.g., Compl. Ex. A.).

*Response* Admitted

4. Admit that Kevin Rhatigan had actual authority to enter into the Wholesale Broker Agreement made and entered into as of 7/22/2019 (e.g., Compl. Ex. A.) on behalf of Kevron.

*Response* Admitted

5. Admit that Kevron submitted mortgage loans and mortgage loan applications to UWM under the terms of the Wholesale Broker Agreement made and entered into as of 7/22/2019 (e.g., Compl. Ex. A.).

*Response* Admitted

6. Admit that Kevron electronically agreed to the 2021 amendments to the Wholesale Broker Agreement.

*Objection* Defendant objects to the term “amendments” as it is not clear what amendments UWM is referencing.

7. Admit that Kevron submitted mortgage loans and mortgage loan applications to UWM after March 2021.

*Response* Admitted

8. Admit that Kevron submitted mortgage loans and mortgage loan applications to Rocket Mortgage after March 2021.

*Response* Admitted

9. Admit that Kevron submitted mortgage loans and mortgage loan applications to Fairway Independent Mortgage after March 2021.

*Response* Denied

10. Admit that Kevron has not terminated the Wholesale Broker Agreement.

*Response* Admitted

11. Admit that UWM has not terminated the Wholesale Broker Agreement before February 15, 2022.

*Response* Admitted

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